

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA)	
)	Case No. 21-265 (PKC)
v.)	
)	HON. PAMELA K. CHEN
)	
CONGYING ZHENG,)	MOTION FOR MODIFICATION OF
)	BOND AND CONDITIONS OF
Defendant.)	RELEASE

The undersigned PAUL A. GOLDBERGER, ESQ., affirms under penalty of perjury, that:

1. I represent defendant Congying Zheng in the above-captioned case.
2. At present, Mr. Zheng is subject to curfew from 9am to 9pm, Monday to Sunday with work permission from Pre-trial Services.
3. Congying Zheng quit his previous job to attend his trial. Mr. Zheng recently found an employment as a Cashier and inventory stocker at a discount store located in Brooklyn and his working schedule is from 9am to 8pm, Monday to Friday.
4. I am writing on behalf of Mr. Zheng requesting to modify his current weekdays curfew from 9am to 9pm to 8am to 12am. Mr. Zheng would like to have additional time to go to the gym after work. Weekends' curfews remain the same, 9am to 9pm.
5. I have conferred regarding this request with AUSA Craig Hereen and Pre-trial Services (EMUnit), who indicate that they have no objection.

WHEREFORE, the Defendant respectfully moves this Court for an Order modifying Mr. Zheng's curfew on weekdays from 9am to 9pm to 8am to 12am at the discretion of the Pre-Trial Services. Weekends curfew will remain the same.

Respectfully submitted,

Dated: New York, New York
August 22, 2023

BY: /s/
PAUL A. GOLDBERGER